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October 21, 2011

**EX PARTE PRESENTATION**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Ex Parte Presentation in WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC  
Docket No. 01-92, 96-45; GN Docket No. 09-51**

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, DISH Network L.L.C. ("DISH Network") and EchoStar Technologies L.L.C. ("EchoStar") submit this letter summarizing a telephone call on Thursday, October 20, 2011 with Christine Kurth, Policy Director and Wireline Counsel for Commissioner Robert McDowell. Present on the telephone call on behalf of DISH Network and EchoStar was Jeffrey Blum, Senior Vice President and Deputy General Counsel.

During the meeting, the DISH Network and EchoStar continued to urge the Commission not to adopt the so-called "ABC Plan" for Universal Service Fund reform advanced by incumbent local exchange carriers ("ILECs"). The ABC Plan ultimately favors ILECs (who are the plan's principal supporters) at the expense of other broadband technologies like satellite broadband. The ABC Plan guarantees ILECs a "right of first refusal" with respect to (or even exclusive access to) \$4.2 billion in High-Cost support, relegates competitive providers to a separate and significantly smaller fund, and rigs the bidding process by defining the boundaries of supported areas according to ILEC wire centers. The ABC Plan would misallocate USF support, undermine competition, and deprive rural consumers of the high-quality and cost-effective services offered by competitive providers. DISH Network and EchoStar agree that USF reform is needed, but any reform should be technology neutral, award funds to the most cost-effective provider, and facilitate competitive entry.

Respectfully submitted,

/s/ Jeffrey H. Blum

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cc: Christine Kurth